

Sept. 16, 2015

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte In the Matter of *Lifeline and Link up Reform and Modernization* (WC Docket No. 11-42); *Telecommunications Carriers Eligible For Universal Service Support* (WC Docket No. 09-197); *Connect America Fund* (WC Docket No. 10-90)

Dear Ms. Dortch:

On Monday, Sept. 14, representing Total Call Mobile (TCM), Michael Morrissey, Vice President-General Counsel, Locus Telecommunications, Inc.^{1/}, along with Geoff Why of Mintz Levin and Alex Hecht of ML Strategies met with Ryan Palmer, Chief, Telecommunications Access Policy Division, Wireline Competition Bureau to discuss the proposed Snapshot Rule.

TCM explained that the Snapshot Rule^{2/} would have a significant negative economic impact on its company if promulgated as drafted. Moreover, TCM shared that in a scenario where a Lifeline customer would de-enroll from the program before TCM received any Lifeline subsidies, it would also have expenditures for acquiring that customer, including marketing and providing a phone.

As discussed in its Coalition filing, TCM proposed a change to the Snapshot Rule.^{3/} In that filing, the Coalition suggested the following rule change to Section 54.407(a):

Universal service support for providing Lifeline shall be provided to an eligible telecommunications carrier, based on the number of actual qualifying low-income consumers it serves directly as of the first day of the month *plus any qualifying consumers de-enrolled in the previous month that received Lifeline service in the prior month. (emphasis added).*^{4/}

^{1/} Locus Telecommunications is the parent corporation of Total Call Mobile, Inc. (TCM).

^{2/} See *Lifeline and Link Up Reform and Modernization, et al*, WC Docket 11-42, et al., Second Further Notice of Proposed rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71 (rel. June 22, 2015) (Second Report and Order).

^{3/} See Wireless ETC Petitioners' Petition for Reconsideration and Clarification, at 8; FCC, WC Docket No. 11-42; WC Docket No. 09-197; WC Docket No. 10-90 (filed Aug. 13, 2015).

^{4/} *Id.*

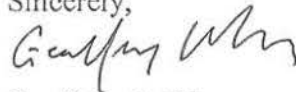
Mintz, Levin, Cohn, Ferris, Glovsky and Popco, P.C.

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TCM also briefly discussed non-usage of Lifeline services and how to streamline the certification process. Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed via ECFS, and a copy will be provided via email to the attendees.

Sincerely,

A handwritten signature in black ink, appearing to read "Geoffrey Why", written in a cursive style.

Geoffrey G. Why

cc: Ryan Palmer, Wireline Bureau